

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	5:14-CR-0117-LSC-SGC
)	
PATRICIA ALLANA AYERS and)	
MATTHEW DAVID AYERS)	

GOVERNMENT'S DISCLOSURE TO DEFENDANTS

COMES NOW the United States of America by and through Joyce White Vance, United States Attorney for the Northern District of Alabama, and Mary Stuart Burrell, Assistant United States Attorney, and hereby submits the defendants' disclosure as follows:

- A. A discovery packet will be hand delivered to defense counsel on 5-14-2014. There are some discovery materials that are not suitable for photocopying and are available for review at the United States Attorney's Office in Huntsville, Alabama.
- B. The defendants' statements to law enforcement are enclosed in the discovery packet.
- C. The defendants' prior criminal record can be obtained from the United States Probation Office.
- D. The government has provided the defendants with copies of all

documents as provided in F.R. Crim P., Rule 16(a)(1)(C).

- E. Expert witness reports, if they exist, are enclosed in the discovery packet.
- F. All potentially exculpatory information is enclosed in the discovery packet.
- G. Any “statements” of witnesses for the United States that are not already enclosed in the discovery packet will be provided after the witness has testified on direct examination and upon timely and specific request of the defendants.
- H. Defendants may call the United States Attorney’s Office to schedule a time to view the physical evidence.
- I. There is no promise of immunity, leniency, or preferential treatment to any government witness. If this should change, the defense will be timely notified.
- J. The government is presently unaware of any recorded grand jury testimony of the defendant relating to the offense charged.

REQUEST RECIPROCAL DISCOVERY

The United States requests the defendants to provide the following:

- A. Books, papers, documents, tangible objects, or copies or portions thereof, which are in the possession, custody or control of the defendants and which the defendants intend to introduce as evidence in chief at trial, in accordance with Fed.R.Crim.P. 16(b)(1)(A).
- B. Any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, within the possession or control of the defendants, which the defendants intend to introduce as evidence in chief at trial or which were prepared by a witness the defendants intend to call at trial when the results or reports relate to his or her testimony, in accordance with Fed.R.Crim.P. 16(b)(1)(B).

Respectfully submitted this the 13th day of May, 2014.

JOYCE WHITE VANCE
United States Attorney

/s/ electronic signature
MARY STUART BURRELL
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and I hereby certify that a copy of the foregoing will be served on the defendants, by hand delivery, this the 13th day of May, 2014.

/s/ electronic signature

MARY STUART BURRELL

Assistant United States Attorney